

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JAN - 6 2021

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAMUEL STODDARD,
ANTHONY FANT, AND
KELLY MILLER,

Defendants.

4:21CR0012 MTS/SRW

INDICTMENT

The Grand Jury charges:

COUNT 1

(Mail Fraud)

A. The Scheme to Defraud

1. Beginning on or about November 1, 2018 and continuing through on or about June 18, 2020, in the Eastern District of Missouri and elsewhere, the defendant,

SAMUEL STODDARD,

being aided, abetted, counseled, and induced by persons unknown to the Grand Jury, with the intent to defraud, did devise, and intend to devise, a scheme and artifice to defraud the State of Missouri, individuals, and businesses by means of material misrepresentations, *e.g.*, that MetroZen Technologies LLC was a legitimate business operation.

2. It was part of the scheme and artifice to defraud that:

- a. Defendant created several fictitious companies, including MetroZen Technologies LLC.
- b. Through means unknown to the Grand Jury, Defendant obtained the identifying information of various individuals.
- c. Defendant produced counterfeit State of Missouri identification documents and documents that could be used as proof of residency.
- d. Defendant submitted the counterfeit documents in support of fraudulent applications for the delivery of mail by the United States Postal Service to commercial mailboxes located in the Eastern District of Missouri and elsewhere.
- e. In order to register his fictitious businesses in the State of Missouri, Defendant filed documents electronically with the State of Missouri Secretary of State falsely claiming that the businesses were organized by individuals whose identities were stolen and by one of the organizer's pets.
- f. As a result of Defendant's fraudulent portrayal of the fictitious MetroZen Technologies LLC as a genuine business, Defendant and individuals, known and unknown to the Grand Jury rented motor vehicles from Hertz Rental Car Company claiming employment with MetroZen Technologies LLC.
- g. A person unknown to the Grand Jury claimed to be employed by MetroZen Technologies LLC. and used a State of Missouri counterfeit driver's license in the

name of J.M. to rent a 2019 Chevrolet Malibu which he failed to return at the conclusion of the rental period to Hertz Rental Car Company.

h. Defendant created counterfeit State of Missouri and State of Illinois motor vehicle titles listing MetroZen Technologies LLC as the owner of the 2019 Chevrolet Malibu.

B. **The Mailing**

3. On or about February 19, 2020, in the Eastern District of Missouri, the defendant,

SAMUEL STODDARD,

for the purpose of executing the above-described scheme to defraud, did knowingly cause to be deposited an envelope containing a letter addressed to J.M. instructing J.M. to contact Hertz Corporation regarding its failure to return a 2019 Chevrolet Malibu rented in the fictitious identity of J.M. that was due to be returned on January 23, 2020, which was sent and delivered by Hertz Corporation, Post Office Box 24130, Oklahoma City, Oklahoma 73124-0130 to J.M., 6642 Clayton Road, Richmond Heights, Missouri 63117.

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS 2 THROUGH 4

(Making a False Statement)

On or about the dates listed below, in the Eastern District of Missouri, the defendant,

SAMUEL STODDARD,

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the United States Postal Service, an agency of the executive branch of the United States, by submitting PS Form 1583, Application for Delivery of Mail through Agent, that represented that the listed applicant was seeking the delivery of mail through the commercial post office box address listed below, when in fact, as Defendant Samuel Stoddard then well knew the applications were fraudulent and the documents submitted as identification had been counterfeited, as alleged below:

<u>COUNT</u>	<u>DATE</u>	<u>IDENTITY</u>	<u>ADDRESS</u>
2	November 12, 2018	T.D.	1200 Lake St. Louis Boulevard # 1027 Lake St. Louis, Missouri 63367
3	February 12, 2019	Z.M.	6642 Clayton Road # 207 Richmond Heights, Missouri 63117
4	May 15, 2020	A.V.	7253 Watson Road # 1207 St. Louis, Missouri 63119

In violation of Title 18, United States Code, Sections 1001(a)(3) and 2.

COUNT 5

(Aggravated Identity Theft)

On or about November 4, 2018, in the Eastern District of Missouri, the defendant,

SAMUEL STODDARD,

did knowingly possess, transfer, and use, without lawful authority, a means of identification, to wit, the name of T.D., during and in relation to the commission of the felony offenses of: mail fraud, Title 18, United States Code, Section 1341; using an assumed name and address, Title 18, United States Code, Section 1342; and, wire fraud, Title 18, United States Code, Section 1343, knowing that the means of identification belonged to an actual person.

In violation of Title 18, United States Code, Section 1028A.

COUNT 6

(Aggravated Identity Theft)

On or about February 5, 2020, in the Eastern District of Missouri, the defendant,

**SAMUEL STODDARD,
ANTHONY FANT,
AND
KELLY MILLER,**

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the name of C.M., during and in relation to the commission of the felony offense of production of a false identification document in violation Title 18, United States Code, Section 1028(a)(1), knowing that the means of identification belonged to an actual person.

In violation of Title 18, United States Code, Section 1028A.

COUNT 7

(Identity Theft)

On or about February 5, 2020, within the Eastern District of Missouri, the defendant,

KELLY MILLER,

in a matter affecting interstate commerce, knowingly transferred, possessed, and used, without lawful authority, the means of identification of another, that being the name of C.M., knowing that the means of identification belonged to another actual person, with the intent to commit, and in connection to the crime of forgery in violation of Missouri Revised Statutes 570.090.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT 8

(Possession of Five or More Identification Documents)

On or about February 27, 2020, in the Eastern District of Missouri, the defendants,

**SAMUEL STODDARD
AND
ANTHONY FANT,**

did knowingly possess with intent to use unlawfully and transfer unlawfully five or more identification documents and false identification documents not issued lawfully for the use of the defendants, to wit, birth certificates, social security cards, Missouri temporary driver's licenses, a driver's license, and an Immigration and Naturalization Service Refugee Travel Document.

In violation of Title 18, United States Code, Section 1028(a)(3).

COUNT 9

(Possession of Document-Making Implements)

On or about February 27, 2020, in the Eastern District of Missouri, the defendants,

SAMUEL STODDARD,

knowingly and with intent to defraud, had control and custody over, and possessed device-making equipment, to wit, a Toshiba laptop computer, an HP laptop computer, and a notary seal, said control and custody, and possession, affecting interstate and foreign commerce in that the equipment was used to produce counterfeit identification documents as if they had been issued by state governments and the federal government.

In violation of Title 18, United States Code, Section 1028(a)(5).

COUNT 10

(Possession of Falsely Made Securities)

On or about February 27, 2020, within the Eastern District of Missouri, the defendant,

SAMUEL STODDARD

AND

ANTHONY FANT,

did possess falsely made securities, that is, counterfeit motor vehicle titles appearing to have been issued by the States of Missouri and Illinois and listing the Vehicle Identification Number

of a 2019 Chevrolet Malibu which had been fraudulently obtained from Hertz Rental Cars by Defendants Samuel Stoddard and Anthony Fant.

In violation of Title 18, United States Code, Sections 2315 and 2.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1341, upon conviction of an offense in violation of Title 18, United States Code, Section 1341 as set forth in Count 1, the defendant shall forfeit to the United States of America any property constituting, or derived from, proceeds the defendant obtained, directly or indirectly, as a result of such violation(s) and any personal property used or intended to be used to commit the offense.
2. Subject to forfeiture is a sum of money equal to the total value of any property constituting, or derived from, proceeds the defendant obtained, directly or indirectly, as a result of the violations set forth in Count 1.
3. Pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1028, upon conviction of an offense in violation of Title 18, United States Code, Section 1028 as set forth in Counts 8, 9, and 10, the defendant shall forfeit to the United States of America any property constituting, or derived from, proceeds the defendant obtained, directly or indirectly, as a result of such violation(s) and any personal property used or intended to be used to commit the offense.
4. Subject to forfeiture is a sum of money equal to the total value of any property constituting, or derived from, proceeds the defendant obtained, directly or indirectly, as a result

of the violations set forth in Counts 8, 9, and 10.

5. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER FLEMING
United States Attorney

TRACY LYNN BERRY - 014753 TN
Assistant United States Attorney